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## REMARKS

### I. Status Summary

Claims 1-45 were pending in the present application prior to this amendment. Claims 1-45 presently stand rejected. By this amendment, claims 1, 23, 30, and 37 have been amended, claims 29 and 36 have been canceled, and new claims 46-49 have been added. Therefore, upon entry of this amendment, claims 1-28, 30-35, and 37-49 will be pending in the subject patent application.

### II. Claim Rejections – 35 U.S.C. § 103

Claims 1-15, 20, 21, 23-29, 37-39, 41, 43, and 44 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 5,036,984 to Labarthe in view of U.S. Patent No. 6,168,080 to Verschuur.

Claims 16-18 and 39-41 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent No. 6,073,060 to Robinson.

Claims 19, 22, 42, and 45 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent No. 4,858,907 to Eisener et al.

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Claims 30-36 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent Application Serial No. 2001/0032881 to Wells et al.

Applicant has carefully studied the Examiner's comments and contentions set forth in the Official Action and respectfully submits that the presently claimed subject matter is not rendered obvious by any combination of the cited references. The Examiner's rejections based on 35 U.S.C. § 103(a) are respectfully traversed as discussed below.

A. Labarthe in view of Verschuur

(i) Examiner's Argument

Claims 1-15, 20, 21, 23-29, 37-39, 41, 43, and 44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe in view of Verschuur.

With regard to independent claim 1, the Examiner states that Labarthe discloses the limitation of providing a closed face package including a document inserted within the package, wherein the package has a window permitting a portion of the document to be read from a location outside of the package, as well as the limitation of using a first reading device to read data printed on the package. With regard to the limitation of using a second reading device to read document data, the document data having been printed on the inserted document and appearing through the window, the Examiner acknowledges that Labarthe does not specifically disclose a second reading

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device that reads the document contained within the envelope. However, the Examiner contends that Verschuur discloses a system that scans the exterior of envelopes and compares address information searching for a mismatch along with a system which scans the interior contents of an envelope to detect variations in the capacitance of a specialized electrically conductive ink contained on the document within the envelope. Therefore, the Examiner reasons that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine the envelope processing systems of Labarthe with the envelope content accessing system of Verschuur because this would ensure the envelopes were properly dispatched to their recipients by reducing the error rate inherent to the sorting and processing of large numbers of mail pieces.

Continuing with independent claim 1, the Examiner addresses the limitations of: reading a data file to access account information stored therein that corresponds to the document data; comparing at least a portion of the accessed account information with the package data to determine whether a matching association exists between the package data and the document data; if the matching association is determined to exist, allowing the package to be further processed; and if the matching association is determined not to exist, preventing the package from being further processed. The Examiner contends that Labarthe teaches ensuring that envelopes are correctly processed to avoid mistakes that would not allow checks to be processed through the clearing

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organizations based on the indicia located on the check's envelope. The Examiner also contends that Labarthe discloses updating payee's address information, essentially disclosing an account that stores payee address information that can be accessed and checked to ensure that a match exists between the indicia on the envelope and the account on file. Therefore, the Examiner reasons, it would have been obvious to one of ordinary skill in the art at the time of the invention to make certain that envelopes are being processed correctly and sent to the intended recipients and preventing envelopes from being sent to the wrong recipients because this increases the efficiency of the system and certifies that recipients receive the checks on time and in good order.

The Examiner further rejects independent claims 23 and 37 and dependent claims 2-15, 20, 21, 24-29, 38-39, 41, 43, and 44 based on Labarthe in combination with Verschuur.

Applicant respectfully traverses the rejections based upon Labarthe and Verschuur as discussed below.

(ii) Response To Examiner's Argument

Labarthe discloses a method for enabling, without first opening the envelope, prioritized processing of envelopes according to indication of clearing organizations of potentially enclosed checks. The method uses a payee address to convey information that encodes indicia of the clearing organization utilized by the drawer's payor bank. The address information is supplied in a

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manner so that the encoded indicia are readable from the unopened envelope. The envelopes are sorted unopened according to the encoded indicia after being read by an automatic reader such as an optical address reader, bar code reader, or combination thereof. After reading and sorting, the envelopes can be selectively processed in a manner determined by the encoded indicia of the clearing organization.

Applicant notes that Labarthe merely teaches the use of a first optical reader for reading data on the outside of an envelope. As the Examiner acknowledges, Labarthe does not disclose a second reading device for reading data on inserted documents. Additionally, Labarthe does not teach or suggest the use of an external data file containing account information for comparison with acquired package data and document data in order to further process the package.

Verschuur discloses a system for acquiring encoded information from the contents of sealed envelopes or other layered structures that conceal the information from view. Verschuur is directed to outgoing mail that is subject to sorting and other processing errors that are difficult to detect because once sealed, the contents are concealed from view. Verschuur accomplishes this information acquisition by means of a transducer that measures changes in capacitance of a localized region beneath the surface of the envelope, such as can be produced by conductive inks or inks with a dielectric constant different from the paper upon which it is printed. The information obtained by the

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capacitance measurements can be used to affect further processing of the envelopes or other layered structures, such as comparing the obtained content information with address information optically read from the envelope to verify a match.

The envelope content detector of Verschuur requires the use of a transducer or parallel plate capacitors that are connected to an amplifier whose output is then examined by a computer. Document information within the envelope is printed using either conductive ink or dielectric ink using conventional bar-code or other conventional symbols that are interpretable in alphanumeric characters, and when either ink passes between the plates of the transducer, the capacitance changes. The transducer of Verschuur is directed solely to detection of conductive or dielectric ink that may be present on one or more documents inserted into an envelope. There is no teaching or suggestion of line-of-sight optical reading by the detector of Verschuur that detects the envelope content information and therefore alphanumeric information, such as addresses, account numbers, and the like, cannot be read directly from the document inserts.

The present subject matter is directed to physical verification of matching associations between information or data printed on a closed face package (package data) and material and/or information contained inside, but viewable through, the closed face package (document data). In order to better clarify and

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more particularly point out the present subject matter, independent claims 1, 23, 30 and 37 have been amended as set forth above and described below.

Independent claim 1 is directed to a method for physically verifying a correct association between information printed on a closed face package and material and/or information contained within the package. As presently amended for clarification, the first reading device of the present subject matter is designed to read the printed package data on the package. This first reading device may be of any reading device known to those of skill in the art, including optical readers, bar code readers, and the like. As amended, claim 1 also recites that the second reading device optically reads printed document data on the inserted document and appearing through a window in the package. This second reader therefore utilizes line-of-sight reading of the inserted document and is designed for reading of the document data itself and not for merely detecting the presence of or number of inserted documents. As originally presented, independent claim 1 continues to recite reading of a data file to access account information stored therein corresponding to the document data and comparing at least a portion of the accessed account information with the package data to determine whether a matching association exists between the package data and the document data. Therefore, it is important to note that, rather than the package data and document data being compared to directly to one another for content verification, a data file with account information

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corresponding to document data is utilized and the account information is compared with the package data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 1. Specifically, Labarthe and Verschuur fail to teach or suggest a second reading device that optically reads printed document data on the inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest reading of a data file to access account information therein corresponding to document data or comparing at least a portion of the accessed account information with the package data to determine whether a matching association exists between the package data and the document data. Verschuur does discuss reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. The comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data in order to compare the package data and document data.

Independent claim 23 is directed to a system for physically verifying a correct association between information printed on a closed face package and



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material and/or information contained inside the package. As presently amended, claim 23 recites that the optical reader is adapted to optically read printed package data on a closed face package and to optically read printed document data on an inserted document and appearing through a window in the package. This optical reader allows for line-of-sight reading of the inserted document and is designed for reading of the document data itself and not for merely detecting the presence of or number of inserted documents. As claim 23 further recites, an electronic processing apparatus is adapted to access a data file and retrieve data forming a part of account information specific to a mail recipient and corresponding to document data, and to compare at least a portion of the data forming a part of the account information with the package data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, a data file with account information corresponding to document data is utilized and the account information is compared with the package data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination the elements of amended independent claim 23. Specifically, Labarthe and Verschuur fail to teach or suggest an optical reading device that optically reads printed document data on the inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest the accessing a data file and retrieving data forming a part of the account information corresponding to the

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document data or comparing at least a portion of the data forming a part of the account information with the package data to determine whether a matching association exists between the package data and the document data. As noted above, Verschuur does discuss reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Also, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data in order to compare the package data and document data.

Independent claim 30 is directed to a mailpiece processing system. As presently amended, claim 30 recites that the reader is adapted to optically read printed package data on a closed face package and to optically read printed document data on an inserted document and appearing through a window in the package. This optical reader allows for line-of-sight reading of the inserted document and is designed for reading of the document data itself and not for merely detecting the presence of or number of inserted documents. As also recited in claim 30, an electronic processing apparatus is adapted to access a data file and retrieve data forming a part of account information specific to a

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mail recipient and corresponding to document data and to compare at least a portion of the data forming a part of the account information with the package data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared to one another directly for content verification, a data file with account information corresponding to document data is utilized and the account information is compared with the package data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination the elements of amended independent claim 30. Specifically, Labarthe and Verschuur fail to teach or suggest an optical reading device that optically reads printed document data on the inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest accessing a data file and retrieving data forming a part of the account information corresponding to the document data or comparing at least a portion of the data forming a part of the account information with the package data to determine whether a matching association exists between the package data and the document data. As noted above, Verschuur does discuss reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Moreover, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may

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allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data in order to compare the package data and document data.

Independent claim 37 is directed to a computer program product adapted for physically verifying a correct association between information printed on a closed face package and material and/or information contained inside the package. As presently amended, the document data is optically read through a window in the package by a second optical reading device. The second optical reader allows for line-of-sight reading of the inserted document and is designed for reading of the document itself and not for merely detecting the presence of or number of inserted documents. Independent claim 37 of the present subject matter is also directed to reading a data file to access account information stored therein corresponding to the document data and comparing at least a portion of the accessed account information with the package data to determine whether a matching association exists between the package data and the document data. Once the first optical reader reads the package data and the second optical reader reads the document data, the package data and document data are sent to a machine control where the comparison with the account information data file is conducted. Therefore, it is important to note that, rather than the package data and document data being compared to one another directly for content verification, a data file with account information

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corresponding to document data is utilized and the account information is compared with the package data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination the elements of amended independent claim 37. Specifically, Labarthe and Verschuur fail to teach or suggest a second reading device that optically reads printed document data on the inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest the reading of a data file to access account information therein corresponding to the document data or comparing at least a portion of the accessed account information with the package data to determine whether a matching association exists between the package data and the document data. As noted above, Verschuur does discuss reading data on the outside of an envelope using a conventional optical reader, but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. Moreover, the comparison made between the envelope data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data in order to compare the package data and document data.

(iii) Summary

Labarthe combined with Verschuur fail to teach or suggest the use of an reading device for optically reading printed document data on an inserted document within the package, reading a data file to access account information stored therein corresponding to the document data, or comparing at least a portion of the accessed account information with the package data to verify a matching association between the package data and the document data. Applicant respectfully submits therefore that Labarthe and Verschuur, either in combination or alone, do not render obvious claims 1-15, 20, 21, 23-29, 37-39, 41, 43, and 44.

B. Labarthe and Verschuur in view of Robinson

(i) Examiner's Argument

Claims 16-18 and 39-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur in view of Robinson.

With regard to dependent claims 16 and 39, the Examiner acknowledges that Labarthe does not specifically disclose indicating an error condition if the matching associations is determined not to exist. However, the Examiner contends that Robinson discloses displaying an error message. Therefore, the Examiner reasons that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine the package sorting and reading device of Labarthe/Verschuur as shown above with the error message display

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of Robinson because this would provide an indication to a member of staff that a mishap has occurred on the mail sorting device, prompting the individual to take proper corrective action.

In regards to dependent claims 17 and 40, the Examiner acknowledges that Labarthe/Verschuur do not specifically disclose displaying a human-readable error message. However, the Examiner contends that Robinson discloses displaying an error message. Therefore, the Examiner reasons that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine the package sorting and reading device of Labarthe/Verschuur as shown above with the error message display of Robinson because this would provide an indication to a member of staff that a mishap has occurred on the mail sorting device, prompting the individual to take proper corrective action.

In regards to dependent claims 18 and 41, the Examiner states that the combination of Labarthe/Verschuur/Robinson discloses the error condition display as shown above, but the Examiner acknowledges that Labarthe/Verschuur do not specifically disclose updating a database file with a print failure code. However, the Examiner contends that Labarthe teaches ensuring that envelopes are correctly processed to avoid mistakes that would not allow checks to be processed through the clearing organizations based on the indicia located on the check's envelope and that Labarthe also discloses updating payee's address information. Therefore, the Examiner reasons that it

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would have been obvious to one of ordinary skill in the art at the time of the invention to update the addressee database with an error code after an error has been detected because this flags an addressee account indicating that current address information is required, thereby increasing the efficiency of the system and certifying that recipients receive the checks on time and in good order.

(ii) Response To Examiner's Argument

Applicant notes that Robinson merely teaches a manually operated mail sorting station for sorting pieces of unsorted mail into numerous bins in a case for holding sorted mail. The sorting station includes a scanner that reads an address printed on the pieces of unsorted mail and communicates through an interface to a computer that stores the address in memory. The sorter includes detectors attached to non-matching bins that may send back an error signal over the connection between the case and the computer in the event they sense that the unsorted mail has been placed in a non-matching bin, wherein the error signal may sound an alarm, display an error message, or the like.

The manual mail sorting station disclosed in Robinson is designed solely for use with manual sorting of rejected letters to assigned delivery mapping schemes (delivery bins) and is not related to verifying that the enclosed contents of a mailpiece or other enclosure correctly match the printed address or other information on the mailpiece. Additionally and as discussed above, Labarthe combined with Verschuur fail to teach or suggest a number of features



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of the presently claimed subject matter. The addition of Robinson fails to overcome the significant shortcomings of Labarthe combined with Verschuur. Applicant respectfully submits therefore that no combination of Labarthe and Verschuur, even in combination with the prior art manual mail sorting station taught by Robinson, renders obvious claims 16-18 and 39-41.

C. Labarthe and Verschuur in view of Eisener et al.

(i) Examiner's Argument

Claims 19, 22, 42, and 45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of Eisener et al.

With regard to dependent claims 19 and 42, the Examiner states that the combination of Labarthe and Verschuur discloses the package and envelope reading device as shown above, but the Examiner acknowledges that Labarthe and Verschuur do not specifically disclose rendering inoperable a mail processing machine by which the package is being processed. However, the Examiner contends that Eisener et al. disclose halting the mail sorting system upon detection of an error. Therefore, the Examiner reasons that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine the package sorting and reading device of Labarthe and Verschuur as shown above with the shut down mechanism of Eisener et al. because this would prevent improperly addressed mail pieces from being sent out to the addressee.

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With regard to dependent claims 22 and 45, the Examiner states that the combination of Labarthe and Verschuur discloses the package and envelope reading device as shown above, but the Examiner acknowledges that Labarthe and Verschuur do not specifically disclose determining at a predetermined point in time whether the printer has performed a printing operation on the closed face package, and causing the closed face package to be rejected if the printer has not performed the printing operation at the predetermined point in time. However, the Examiner contends that Eisener et al. disclose halting the mail sorting system upon detection of an accumulated number of interrupts. The Examiner states that while Eisener et al. do not specifically disclose rejecting a package based on the error and subsequent cessation of sorting and printing activities, it is obvious that corrective action would have to be taken in order to ensure that each package was properly addressed. Therefore, the Examiner reasons that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine the package sorting and reading device of Labarthe and Verschuur as shown above with the shut down mechanism of Eisener et al. because this would prevent improperly addressed mail pieces from being sent out to the addressee.

#### (ii) Response To Examiner's Arguments

Eisener et al. teach an envelope feeding assembly for feeding of and printing on envelopes while the envelopes are in motion. This envelope feeding

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and printing assembly consists of a system as known in the prior envelope feeding art and has all of the disadvantages associated with prior envelope feeding systems wherein the enclosed contents of the envelope cannot be correctly verified with the printed address or other information on the outside of the envelope. Additionally and as discussed above, Labarthe combined with Verschuur fail to teach or suggest a number of features of the presently claimed subject matter. The addition of Eisener et al. fails to overcome the significant shortcomings of Labarthe combined with Verschuur. Applicant respectfully submits therefore that no combination of Labarthe and Verschuur, even in combination with the prior art envelope feeding and printing assembly taught by Eisener et al., renders obvious claims 19, 22, 42, and 45.

D. Labarthe and Verschuur in view of Wells et al.

(i) Examiner's Arguments

Claims 30-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of Wells et al.

With regard to independent claim 30, the Examiner states that Labarthe and Verschuur disclose the limitations of the claim, but do not specifically disclose an insertion device. However, the Examiner contends that Wells et al. disclose an insertion device. Therefore, the Examiner reasons that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine the package sorting and reading device of Labarthe and Verschuur

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as shown above with the insertion device of Wells et al. because it would provide a seamless and efficient envelope and package reading, sorting, stuffing, and mailing station.

The Examiner further rejects dependent claims 31-36 based on the teachings of Labarthe and Verschuur in combination with Wells et al.

(ii) Response To Examiner's Arguments

Wells et al. teach an automated electronic verification system operative at the point of creation of a mail piece to enhance customer tracking of mail pieces and other data exchange functions between the Postal service, mass mailers and their customers. Wells et al. is directed to verification of address information and postage value in order to enhance the revenue protection of the postal service and does not address the problems associated with prior art inserters and verifiers wherein the enclosed contents of an envelope cannot be correctly verified with the printed address or other information on the outside of the envelope. Additionally and as discussed above, Labarthe combined with Verschuur fail to teach or suggest a number of features of the presently claimed subject matter. The addition of Wells et al. fails to overcome the significant shortcomings of Labarthe combined with Verschuur. Applicant respectfully submits therefore that no combination of Labarthe and Verschuur, even in combination with the prior art postage value verifier taught by Wells et al., renders obvious claims 30-36.

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#### E. Summary

In light of the above amendments and remarks, applicant respectfully submits that the cited references, either alone or in combination, fail to render obvious claims 1-28, 30-35, and 37-45, and applicant submits that the rejection of these claims under 35 U.S.C. § 103(a) should be withdrawn and the claims allowed at this time. Claims 29 and 36 have been canceled and therefore the rejection of these claims is considered moot.

#### III. New Claims

New claims 46-49 have been added by the present amendment as set forth above. The language of claims 46-49 corresponds essentially to claims 1, 23, 30 and 37, respectively, but all recite "insert material" and "insert data" instead of "material and/or information and document data", respectively. All of the new claims recite that the insert data is optically read, a data file is used that contains account information corresponding to the insert data, and a comparison occurs of the account information with the package data to determine whether a matching association exists between the package data and the insert data. New claims 46-49 are considered patentable over the cited patents, as the cited patents, either alone or in combination, fail to teach or suggest either of the features listed above. No new matter has been added.

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CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above Remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

DEPOSIT ACCOUNT

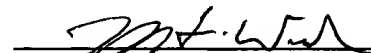
The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. 50-0426.

Respectfully submitted,

JENKINS, WILSON & TAYLOR, P.A.

Date: August 30, 2004

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